

Appl. No. 10/072,616  
Amdt. Dated May 20, 2004  
Reply to Office Action of February 20, 2004

Attorney Docket No. 81751.0028  
Customer No.: 26021

### REMARKS

This application has been carefully reviewed in light of the Office Action dated February 20, 2004. Claims 1-21 remain in this application. Claims 1, 21 are the independent Claims. Claim 1 has been amended to correct a typographical error. It is believed that no new matter is involved in the amendments or arguments presented herein. Reconsideration and entrance of the amendment in the application are respectfully requested.

### Non-Art Based Rejections

Claims 4, 10 and 17 were rejected under 35 U.S.C. § 112, for lack of enablement. Applicant respectfully traverses this rejection and submits that the specification of the present application is fully enabling under the standards of §112, first paragraph.

The Office Action contends that "the disclosure, when filed, does not contain sufficient information regarding to the claimed features..." This statement implies that the rejected claims were not present in the original application. In response, Applicant respectfully points out that the rejected claims were present in the original application at the time the application was filed.

According to MPEP §2164.04, the burden is on the Examiner to establish lack of enablement. Accordingly, the MPEP rules make clear that

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Before any analysis of enablement can occur, *it is necessary for the examiner to construe the claims.* For terms that are not well-known in the art, or for terms that could have more than one meaning, it is necessary that the examiner select the definition that he/she intends to use when examining the application, based on his/her understanding of what applicant intends it to mean, *and explicitly set forth the meaning of the term and the scope of the claim when writing an Office action.*

See, MPEP § 2164 (citing Genentech v. Wellcome Foundation, 29 F.3d 1555, 1563-64, 31 USPQ2d 1161, 1167-68 (Fed. Cir. 1994)).

Applicant respectfully submits that the above standard has not been met here. Specifically, Applicant respectfully points out that the Office Action has not "*explicitly set forth the meaning of the term and the scope of the claim when writing an Office action,*" as required by MPEP § 2164.

Moreover, Applicant respectfully submits that all the elements of Claim 4 are fully described in the specification so as to enable one of ordinary skill in the art to practice the invention of that claim, thus satisfying the enabling requirement of §112, paragraph 1. For example, the "line data register" feature of the claim is described and shown in the specification on Page 22, lines 22-27; Page 23, lines 1-6 and 13-20 and Figure 8. Similarly, the "column data" feature of the invention of Claim 4 is described and shown on Page 21, lines 12-17, Page 22, lines 8-14 and Figures 6 and 7A. Likewise, the "image determination data" element of Claim 4 is shown and described on Page 6, line 2 to Page 8, line 26; Page 13, lines 5-11; Page 17, lines 7-11; Page 18, line 23 to Page 24, line 16; Figure 8, 11A and 11B.

Accordingly, Applicants respectfully submit that one skilled in the art would clearly be able to practice the invention of Claim 4 and, accordingly, that claim fully meets the enabling requirements of § 112, first paragraph.

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Reconsideration and withdrawal of the above § 112 rejections are respectfully requested.

#### Art-Based Rejections

Claims 1-3, 7-9, 13-16, 20 and 21 were rejected under 35 U.S.C. §102(b) over JP408076721A (Kudo); Claims 1-3, 7-9, 13-16, 20 and 21 were rejected under 35 U.S.C. 102(e) over US 2002/0018058 A1 (Tamura); Claims 5, 6, 11, 12, 18 and 19 were rejected under 35 U.S.C. 103(a) over Kudo in view of U.S. Patent No. 5,530,797 (Uya).

Applicant notes that although the rejection over Tamura is under §102(e), the discussion of the rejection in the Office Action, page 4, ¶6, refers to the Kudo reference. Applicant notes that the referenced figures 6 and 7 are not included in the Tamura reference. Accordingly, the rejection over Tamura appears to be a §103 rejection. Correction and clarification of the above described error is respectfully requested.

#### The Kudo et al. Reference

Kudo is directed to a matrix display device which displays animation images and static images in combination. (See, *Kudo*, abstract; [009]). Kudo teaches a video data latch circuit 103, which stores moving picture data in frame units. (See, *Kudo*, [0016]; [0014], lines 10-12; [0019], lines 3-4).

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### The Tamura Reference

Tamura is directed to a RAM incorporated driver. (*See, Tamura, abstract; [0002]*). According to Tamura, data is written to the moving-image storage area 320A of the second display data RAM 320 in frame units and is read therefrom in frame units. The read frames are displayed on the moving-image display area 22A of the liquid crystal panel 22. (*See, Tamura, [0149]*). Likewise, Tamura teaches that data is written to the still-image storage area 310A of the first display data RAM 310 and is read therefrom in frame units. The still image is then displayed on the still-image display area 22B of the liquid crystal panel. (*See, Tamura, [0149]*).

### The Uya Reference

The ancillary Uya reference is directed to a workstation for video display to display simultaneously a plurality of video dynamic images. (*See, Uya, abstract; Col. 1, lines 9-11*).

### The Claims are Patentable Over the Cited References

The present application is generally directed to a display driver. As defined by amended independent Claim 1, a display driver, which drives a display section based on still-image data and moving-image data, includes a random access memory (RAM) from which still-image data is read out for each scan line. A line memory stores moving-image data in scan line units. A selector selects and outputs one of a scan line output from the RAM and a line memory output for each column position, based on image determination data.

The applied references do not teach or suggest the above features of the present invention. In particular, the applied references do not teach or suggest "a

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random access memory (RAM) from which still-image data is read out for each scan line;" as required by the claims of the present invention.

Moreover, the applied references do not disclose or suggest "a line memory in which is stored moving-image data in scan line units," as required by the claims of the present invention.

Kudo, cited by the Office Action, is directed to a matrix display device which displays animation images and static images in combination. (*See, Kudo, abstract; [009]*). The cited portions of the Office Action do not assert that the still-image data are read out from the still picture display memory 104 of Kudo in scan lines. Accordingly, the portions of Kudo cited by the Office Action do not teach or suggest "a random access memory (RAM) from which still-image data is read out for each scan line;" as required by the claims of the present invention.

Moreover, Kudo discloses a video data latch circuit 103, which stores moving picture data in frame units. (*See, Kudo, [0016]; [0014], lines 10-12; [0019], lines 3-4*). In contrast, the claims of the present invention require "a line memory in which is stored moving-image data in scan line units." This results in less power consumption and more efficient operation of an electronic equipment using the display driver of the present invention, as compared to those of the prior art. (*See, Application, page 2, lines 8-12*).

Similarly, Tamura, cited by the Office Action, teaches that data is read from the still-image storage area 310A of the first display data RAM 310 in frame units. (*See, Tamura, [0149]*). Therefore, Tamura does not disclose or suggest "a random access memory (RAM) from which still-image data is read out for each scan line;" as required by the claims of the present invention.

Likewise, Tamura teaches that data is written to the moving-image storage area 320A of the second display data RAM 320 in frame units. (*See, Tamura,*

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[0149]). Accordingly, Tamura does not disclose or suggest "a line memory in which is stored moving-image data in scan line units," as required by the claims of the present invention.

The ancillary Uya reference is not seen to remedy the above deficiencies of Kudo and Tamura. In particular, Uya does not disclose or suggest the above features of the present invention.

Since the cited reference fails to disclose, teach or suggest the above features recited in amended independent Claim 1, these references cannot be said to anticipate nor render obvious the invention which is the subject matter of those claims.

Accordingly, amended independent Claim 1 is believed to be in condition for allowance and such allowance is respectfully requested.

The remaining claims depend either directly or indirectly from amended independent Claims and recite additional features of the invention which are neither disclosed nor fairly suggested by the applied references and are therefore also believed to be in condition for allowance. For example, with respect to dependent Claim 5, it is noted that that claim requires "the RAM relates the image determination data that indicates whether or not the display section is to be driven on the basis of the moving-image data, with at least each column and stores the image determination data." Applicant respectfully suggests that this requirement is nowhere taught or suggested by the cited references and further distinguishes the present application over applied art.

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**Conclusion**

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (213) 337-6809 to discuss the steps necessary for placing the application in condition for allowance.


If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1314.

Respectfully submitted,

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